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Attorneys for Chapter 7 Trustee

U.S. DISTRICT COURT  
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UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF IDAHO

In Re:	)	Case No. 03-21652
	)	
GERALD & ONA LINDSEY,	)	MOTION TO SHORTEN TIME
	)	
Debtors	)	
	)	
	)	

COMES NOW, Ford Elsaesser, the Chapter 7 Trustee, by and through his attorney of record, Barry McHugh, of ELSAESSER JARZABEK ANDERSON MARKS ELLIOTT & MCHUGH, CHTD., and hereby moves the Court for an order shortening the time required under Bankruptcy Rule 4006 for notice to interested parties of the Second Motion to Amend the Petition, the Motion for Turnover of Property, and the Motion for Turnover of Mail. The Trustee has a good faith believe that if the entities named in the Second Motion to Amend the Petition are not added to the Voluntary Petition and thereby restrained from disposing of assets which the Trustee believes are assets of the bankruptcy estate, if the property owned by Searchlight Trust and River Mountain Ranch is not turned over to the Trustee, and if mail delivered to Pack and Mail, 801 Woodside Road, Redwood City, California 94061 is not turned over to the Trustee, the bankruptcy estate will be diminished.


The Debtors have demonstrated a willingness to transfer assets to entities which have no legal basis, to intentionally forego educating themselves regarding the management and status of

the entities which hold their property, and to hide assets from the Trustee's representatives. The Debtors further claim to have no control over assets placed in entities over the last 10 years, and therefore they would take the position that any order directing them to preserve assets of their estate would have no effect upon the individuals in control of the entities that are legal owners of the property, despite the Trustee's assertion that the entities are merely alter egos for the Debtors. Therefore, an order amending the Voluntary Petition is needed to protect the estate from dissipation of assets, and to have a court order to that effect as soon as possible.

Gary McClendon, of the United States Trustee's Office was contacted by counsel for the Trustee, and has no objection to the shortening of time on the motions.

DATED this 23<sup>rd</sup> day of March, 2004.

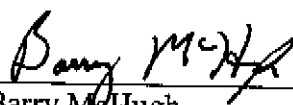
ELSAESSER JARZABEK ANDERSON  
MARKS ELLIOTT & MCHUGH, CHTD.

  
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Barry McHugh  
Attorney for Ford Elsaesser, Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on the 23<sup>rd</sup> day of March, 2004, a true and correct copy of the foregoing MOTION TO SHORTEN TIME was served upon the following via U.S. Mail, first class, postage prepaid.

Ford Elsaesser Chapter 7 Trustee P.O. Box 2220 Sandpoint, ID 83864	U.S. Trustee 304 N. 8 <sup>th</sup> Street, Rm 347 Boise, ID 83702
Brit D. Groom Attorney at Law P.O. Box 218 Grangeville, ID 83530	Warren Derbidge US Attorney's Office 877 w. Main, Ste. 201 Boise, ID 83702
Sheila R. Schwager Hawley Troxell P.O. Box 1617 Boise, ID 83701-1617	Gerald & Ona Lindsey HC01 Box 109A White Bird, ID 83554
Mountain Property Management and Trust Company HC01 Box 109B White Bird, ID 83554	National Holding Trust HC01 Box 109B White Bird, ID 83554
Equitable Financial Services HC01 Box 109B White Bird, ID 83554	

  
Barry McHugh